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 Attorneys for Plaintiff  
 Pajaro Valley Unified School District

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

\*E-FILED - 4/6/06\*

PAJARO VALLEY UNIFIED SCHOOL  
 DISTRICT,

Plaintiff,

v.

J.S., A.O., and DOES 1-10, inclusive,

Defendants.

Case No. C06-00380

**JOINT STIPULATION**

Plaintiff PAJARO VALLEY UNIFIED SCHOOL DISTRICT and Defendants J.S. AND A.O.,  
 by and through their respective counsel of record, hereby stipulate as follows:

1. The names of J.S., a minor child, and A.O., his mother, (together, "Defendants") are entitled to protection under law, specifically Civil Local Rule 3-17, subdivision (a)(2). The rule requires all documents filed in the public file to protect the privacy and identity of a minor child by using only the initials of that child. In order to satisfy the intent of the Local Rule, parties must use only the initials of the parent of the minor child.

2. In all documents filed in this matter on or after the date of this stipulation, the parties agree to use only the initials J.S. and A.O. in place of the Defendants' names.

3. The following pleadings and orders, which include all documents filed in this matter on or before to February 15, 2006, (hereinafter, "Pleadings and Orders") use the names of Defendants: {SR032097.DOC}

JOINT STIPULATION

PAJARO UNIFIED SCHOOL DISTRICT  
 v. J.S., A.O., and DOES 1-10, INCLUSIVE

- (a) Civil Cover Sheet and Complaint and Appeal of an Administrative Decision, with the exhibits thereto, filed on or about January 20, 2006;
- (b) Ex Parte Request for an Order Permitting Use of Pseudonyms, filed on or about January 20, 2006;
- (c) Alternative Dispute Resolution Scheduling Order, filed on or about January 20, 2006;
- (d) Summons, filed on or about January 24, 2006;
- (e) Affidavit in Opposition to the Ex Parte Request for an Order Permitting Use of Pseudonyms, filed on or about February 14, 2006;
- (f) Answer, filed on or about February 14, 2006;
- (g) Motion for Leave to Proceed in forma pauperis, filed on or about February 15, 2006.

This information is protectable by law. The parties are therefore entitled to have the Pleadings and Orders removed from the public file and placed under seal pursuant to Civil Local Rule 79-5. The parties respectfully request this court to enter an order requiring the Pleadings and Orders to be removed from the public file and placed under seal. In addition, the parties respectfully request this court to enter an order sealing or removing information containing Defendant identities on the e-file civil docket.

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JOINT STIPULATION

4. Pursuant to General Order No. 53, filed herewith is Plaintiff's [Amended] Complaint and Appeal of an Administrative Decision and Defendant's [Amended] Answer (together "Amended Pleadings"), both of which use J.S. and A.O. in place of the names of Defendants. The parties respectfully request this court to enter an order requiring the Amended Pleadings to be filed in the public file in place of the pleadings.

Dated: March \_\_, 2006

LOZANO SMITH

Dated: March \_\_, 2006

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LAURIE E. REYNOLDS  
Attorneys for Plaintiff

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LUIS ALEJO,  
CALIFORNIA RURAL LEGAL ASSISTANCE  
EILEEN MATTEUCCI,  
LAW OFFICE OF EILEEN MATTEUCCI  
STEPHEN ROSENBAUM,  
PROTECTION AND ADVOCACY  
Attorneys For Defendant

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JOINT STIPULATION

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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

PAJARO VALLEY UNIFIED SCHOOL  
 DISTRICT,

Plaintiff,

v.

J.S., A.O., and DOES 1-10, inclusive,

Defendants.

Case No. C06-00380

**ORDER DIRECTING THE  
 CLERK TO FILE DOCUMENTS UNDER  
 SEAL**

**ORDER**

The following documents shall be removed from the public file and filed under seal:

- (a) Civil Cover Sheet and Complaint and Appeal of an Administrative Decision, with the exhibits thereto, filed on or about January 20, 2006;
- (b) Ex Parte Request for an Order Permitting Use of Pseudonyms, filed on or about January 20, 2006;
- (c) Alternative Dispute Resolution Scheduling Order, filed on or about January 20, 2006;
- (d) Summons, filed on or about January 24, 2006;
- (e) Affidavit in Opposition to the Ex Parte Request for an Order Permitting Use of Pseudonyms, filed on or about February 14, 2006;
- (f) Answer, filed on or about February 14, 2006;

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JOINT STIPULATION

(g) Motion for Leave to Proceed in forma pauperis, filed on or about February 15, 2006.

Information containing Defendant's identity shall be removed from the e-file civil docket.

The following documents shall be substituted for the sealed pleadings and be filed in the public file:

- (1) Plaintiff's [Amended] Complaint and Appeal of an Administrative Decision, filed on or about March 16, 2006; and
- (2) Defendants' [Amended] Answer, filed on or about March 17, 2006.

PURSUANT TO STIPULATION IT IS SO ORDERED.

Dated: 4/5/06

/s/ Ronald M. Whyte  
\_\_\_\_\_  
United States District Judge

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JOINT STIPULATION

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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

PAJARO VALLEY UNIFIED SCHOOL  
 DISTRICT,

Plaintiff,

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J.S., A.O., and DOES 1-10, inclusive,

Defendants.

Case No. C06-00380

**DECLARATION OF LAURIE E.  
 REYNOLDS**

I, Laurie E. Reynolds, declare:

1. I have personal knowledge of the matters set forth in this Declaration, or, upon information and belief, I know them to be correct. If called as a witness, I would and could testify competently about these matters.

2. Concurrence in the filing of this Joint Stipulation and Proposed Order has been obtained from Luis Angel Alejo Esq., Eileen Matteucci Esq., and Stephen Rosenbaum Esq.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: March 7, 2006

\_\_\_\_\_  
 Laurie E. Reynolds  
 LOZANO SMITH

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JOINT STIPULATION

**PROOF OF SERVICE**

(Code Civ. Proc. §§ 1013, subd. a, and 2015.5)

I am employed in the County of Contra Costa, California. I am over the age of 18 years and not a party to this action. My business address is LOZANO SMITH, 2000 Crow Canyon Place, Suite 200, San Ramon, California 94583.

On March 16, 2006, I served the attached **JOINT STIPULATION, [PROPOSED] ORDER DIRECTING THE CLERK TO FILE DOCUMENTS UNDER SEAL, and DECLARATION OF LAURIE R. REYNOLDS** on each interested party below:

- ☐ **(BY PERSONAL SERVICE)** I caused a copy of said document to be hand delivered to the interested parties listed below:
- ☐ **(BY FACSIMILE)** I caused a copy of said pleadings to be sent via facsimile transmission to the interested parties listed below:
- ☐ **(BY OVERNIGHT MAIL)** I caused a copy of said pleadings to be sent by overnight mail to the parties listed below:
- ☒ **(BY REGULAR MAIL)** I caused a copy of said pleadings to be placed in a United States mail depository, in a sealed envelope, with postage fully prepaid, to the parties listed below:

**Eileen Matteucci  
Law Office Of Eileen Matteucci  
901 Owhanee Court  
Fremont, CA 94539**

**Stephen Rosenbaum  
Protection and Advocacy  
1330 Broadway, Suite 500  
Oakland, CA 94612-2509**

I declare under the penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed on March 16, 2006, at San Ramon, California.

\_\_\_\_\_  
Dianne Lyons

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JOINT STIPULATION